

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	No. 20 CR 309
LARRY JONES,	)	
	)	Judge Virginia M. Kendall
Defendant.	)	

**MOTION TO MODIFY DEFENDANT JONES' BOND ALLOWING  
HIM TO LIVE IN HIS HOME UNTIL HE GOES INTO CUSTODY**

Defendant Larry Jones, by his attorney, Phillip A. Turner, respectfully requests that this Court enter an order modifying defendant Jones' bond to allow him to reside at his home with his son and his son's mother, until he is taken into custody. In support of this motion, defendant states the following:

1. Defendant Larry Jones has been completely compliant with all conditions of his bond. Defense counsel has contacted the pretrial services officer, Samuel Schroeder, to discuss this proposed change and Mr. Schroeder has no objection to this modification.
2. Currently, defendant Jones resides with his grandmother, Jeraldine Moore, who is 79 years old in Chicago, Illinois. Defendant Jones is on house arrest and is allowed to work and attend religious events.

3. Defendant Jones has one son who is 19 years old and is a disabled person. His son and his son's mother, Shinesha Huston, reside in Broadview, Illinois where defendant Jones lived prior to his arrest. She and defendant Jones have been together for 20 years and lived at this location for approximately 6 years.

4. Defendant Jones has told his son about the wrongful conduct in which he, defendant Jones, engaged and resulted in this case. Defendant Jones has explained to his son that he, defendant Jones, is going to plead guilty and will go to prison. Defendant Jones is making his best efforts with the time he has remaining to give his son guidance to not engage in the criminal activity in which defendant Jones engaged. Defendant Jones is present in his son's life and is trying to prevent his son from following defendant Jones' path. Defendant Jones acknowledges that this is difficult since he has not been a good example to his son and that in his neighborhood, many young black men either go to prison or are murdered. In the last year, defendant Jones' brother was murdered.

5. Defendant Jones is waiting for the final version of the plea agreement to be approved by the supervisors in the United States Attorney's Office so that he can plead guilty and be sentenced. This is the current status of the case. Defendant Jones anticipates that this Court will take him into

custody when he pleads guilty in this matter. He would like to spend as much time with his son as possible before he goes into custody so that he can try to prevent his son from following the same path.

Wherefore, defendant respectfully requests that this Court enter an order allowing Pretrial Services to modify defendant Jones' home detention so that defendant Jones may be on home detention at his home.

Respectfully submitted,  
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Phillip A. Turner  
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## CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that in accordance with Fed.R.Civ.P.5, LR 5.5 and the General Order on Electronic Case Filing (ECF), the following document:

**MOTION TO MODIFY DEFENDANT JONES' BOND ALLOWING  
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was served pursuant to the district court's ECF system as to ECF filers.

Respectfully submitted,

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